

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re)	Chapter 11
)	
)	
W.R. GRACE & CO., et al.,)	Case No. 01-01139 (JKF)
)	
)	
Debtors.)	(Jointly Administered)
)	

**RE-NOTICE OF INTENTION TO TAKE THE VIDEOTAPED
DEPOSITION OF MORTON CORN**

To: Defendant W.R. Grace & Co.

PLEASE TAKE NOTICE that the Official Committee of Asbestos Property Damage will take the videotaped deposition of MORTON CORN commencing at 9:00 a.m. on Friday, the 12th day of January, 2007, at the Hilton Naples, 5111 Tamiami Trail North, Naples, Florida 34103. MORTON CORN shall be required to produce at his deposition the documents set forth on the Subpoena Duces Tecum attached hereto as Exhibit A. The deposition will be upon oral examination before a Notary Public or other officer authorized to administer oaths by the laws of the United States or the State of Florida.

You are invited to attend and cross-examine.

Dated this 18th day of December, 2006.

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Copies furnished to:

Atkinson-Baker, Inc. Court Reporting
Telephone 1-800-288-3376
Fax 1-800-925-5910

EXHIBIT A - CORN

The witness, Morton Corn (also referred to as "he"), shall be required to bring to the deposition the following documents:

1. All documents, data, objects, publications or other materials which the witness has been provided in connection with this bankruptcy case, or which he has reviewed or upon which he will rely for his opinions in connection with the "Methodology" issue and/or adjudication phase in this case, including without limitation any articles, studies, presented papers, correspondence, reports, draft reports, plans, protocols, guidelines, critiques, books, photographs, slides, videotapes, charts, data, testimonies, depositions, presentations, asbestos bulk, dust and/or air samples, or testimony results thereof.
2. All expert reports he has prepared in connection with this bankruptcy case, including but not specifically limited to: the October 14, 2005 Expert Report Settled Dust What Is It and Is it Relevant to Assessment of Asbestos Inhalation Risk? and the January 18, 2006 Supplement to Expert Report of Morton Corn, Ph.D., CSP Submitted October 14, 2005.
3. All correspondence, notes, journal entries or memoranda or other records of communication in your possession or control between any journal or other publishing entity or its representatives and you, your laboratory or any of your employees, students or co-authors concerning the actual or contemplated submission of any article or study concerning asbestos, asbestos in buildings, air sampling or analysis, and/or dust deposition, redispersion, sampling and/or analysis that was authored, co-authored or contributed to by you for peer review or publication from 1999 to the present.
4. All correspondence, notes, journal entries, invoices or memoranda or other records or communication in your possession or control between any law firm or former asbestos manufacturer or its employees or representatives and you, your laboratory or any of your employees, students or co-authors concerning the actual or contemplated submission of any article, study or report concerning asbestos, asbestos in buildings, air sampling or analysis, dust deposition, dust redispersion, and/or dust sampling or analysis that was written, co-authored or contributed to by you for peer review or publication from 1999 to the present.